

EXHIBIT 3

From: [David Rudin](#)
To: [Russ III, Hugh M.](#); [Sahasrabudhe, Peter A.](#)
Cc: [Perry, Adam W.](#); jbrudin@rudinlaw.com; [Thelo Coleman](#); [Firsenbaum, Ross](#); [Perio, Ryanne](#); [Hanft, Gideon A.](#); [WH Buffalo 5 Internal Team](#); thoover@hooverdurland.com; sdurland@hooverdurland.com
Subject: Boyd and Walker v. City, et al. - Motion to Amend Complaints
Date: Saturday, December 17, 2022 5:56:40 PM
Attachments: [2022-12-17 Boyd Amended Complaint redline.pdf](#)
[2022-12-17 Boyd Amended Complaint.pdf](#)
[2022-12-17 Walker Amended Complaint redline.pdf](#)
[2022-12-17 Walker Amended Complaint.pdf](#)

EXTERNAL SENDER

Dear Hugh and Peter,

We plan to file a motion to amend the complaints in Boyd v. City, et al. and Walker v. City, et al. on Monday. The amended complaints add as defendants the estates of several deceased BPD detectives whose estates were not formed when we filed the initial complaints. It's taken many months to find beneficiaries of the deceased detectives and give them notice in order to provide the probate court with jurisdiction over the estates to appoint an administrator. The new defendants are named in the case caption and the Parties section. We also fixed some errors in the initial complaints, including adding a description of the Boyd trial that was mistakenly omitted from the initial Walker complaint (§§ 642-673) and fixing some internal paragraph references. Finally, we added to the introductions a statement by Larry Watson contained in a Cold Case file produced in discovery.

I've attached redlines showing the proposed changes to the amended complaints, as well as clean copies. Please let us know on Monday if you will consent or, if not, what your position is.

Thanks,
David

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From: [David Rudin](#)
To: [Jennifer C. Persico](#); [Brian C. Mahoney](#)
Cc: [skemnitz@lippes.com](#); [jbrudin@rudinlaw.com](#); [Thelo Coleman](#); [Firszenbaum, Ross](#); [Perio, Ryanne](#); [Hanft, Gideon A.](#); [WH Buffalo 5 Internal Team](#); [thoover@hooverdurland.com](#); [sdurland@hooverdurland.com](#)
Subject: Boyd and Walker v. County, et al. - Motion to Amend Complaints
Date: Saturday, December 17, 2022 5:59:53 PM
Attachments: [2022-12-17 Boyd Amended Complaint redline.pdf](#)
[2022-12-17 Boyd Amended Complaint.pdf](#)
[2022-12-17 Walker Amended Complaint redline.pdf](#)
[2022-12-17 Walker Amended Complaint.pdf](#)

EXTERNAL SENDER

Dear Ms. Persico,

We plan to file a motion to amend the complaints in Boyd v. County, et al. and Walker v. County, et al. on Monday. The amended complaints add as defendants the estates of several deceased BPD detectives whose estates were not formed when we filed the initial complaints. It's taken many months to find beneficiaries of the deceased detectives and give them notice in order to provide the probate court with jurisdiction over the estates to appoint an administrator. The new defendants are named in the case caption and the Parties section. We also fixed some errors in the initial complaints, including adding a description of the Boyd trial that was mistakenly omitted from the initial Walker complaint (¶¶ 642-673) and fixing some internal paragraph references. Finally, we added to the introductions a statement by Larry Watson contained in a Cold Case file produced in discovery.

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